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June 5, 2020

Via ECF

The Honorable Ronnie Abrams, U.S.D.J.
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: LAWRENCE YOUNG, ON BEHALF OF HIMSELF AND ALL OTHER
PERSONS SIMILARLY SITUATED V. ARGOS INN, INC.,
Docket No.: 19-cv-9240-RA

Dear Judge Abrams:

This firm represents the Defendant in this matter. Pursuant to your Honor's Individual Rule 1(d), we respectfully move for a) an extension of time to answer, move or otherwise appear with regard to the Complaint filed in this action until August 11, 2020; b) to adjourn the Initial Conference set for June 19, 2020 to a date beyond August 11, 2020, or to any date convenient to the Court and c) to adjourn the time to submit a joint proposed case management letter from June 12, 2020 to a date beyond August 11, 2020.

The parties are very close to a settlement. Notwithstanding the COVID-19 pandemic hardships placed on our respective firms, the parties have been able to negotiate this matter and both parties feel they need but a short time to complete the negotiations. In view of these strides, Defendant therefore respectfully requests this adjournment.

We have the consent of plaintiff's attorney Darryn G. Solotoff, Esq. for these applications.

This is the fourth request for this application. The first three (3) requests were granted by this Court. If this request is granted, the adjournment will not affect any other dates or deadlines.

The parties both thank the Court in advance for its patience and understanding concerning this matter and do not anticipate the need for further adjournments of the initial proceedings.

Respectfully submitted,


Daniel J. Solinsky

DJS/ds
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CC: Via ECF
Law Office of Darryn G. Solotoff
Attorneys for Plaintiff

Application granted. Defendant shall respond to the Complaint no later than August 11, 2020. The initial conference scheduled for June 19, 2020 is hereby adjourned to August 21, 2020 at 12:00 p.m. The parties shall submit their joint letter and proposed case management plan no later than August 14, 2020.

SO ORDERED.



Hon. Ronnie Abrams
6/8/2020